

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
FIRST GUARANTY MORTGAGE)	Case No. 22-10584 (CTG)
CORPORATION, <i>et al.</i> , ¹)	
)	(Jointly Administered)
)	
)	
Debtors.)	
)	Related Docket No. 518, 638, 652

**CERTIFICATION OF COUNSEL REGARDING FINDINGS OF FACT, CONCLUSIONS
OF LAW, AND ORDER APPROVING DISCLOSURES ON A FINAL BASIS AND (II)
CONFIRMING THE AMENDED COMBINED DISCLOSURE STATEMENT AND
CHAPTER 11 PLAN OF FIRST GUARANTY MORTGAGE CORPORATION AND
DEBTOR AFFILIATE**

The undersigned counsel for the above-captioned debtors and debtors in possession (the “Debtors”) hereby certifies that:

1. On October 31, 2022, the Court held a hearing (the “Hearing”) to consider (i) final approval of the disclosures (the “Disclosures”) contained in the *Amended Chapter 11 Combined Plan & Disclosure Statement of First Guaranty Mortgage Corporation and Debtor Affiliate* [Docket No. 652] (the “Combined Plan”), and (ii) confirmation of the Combined Plan, as modified and restated at Docket No. 652.

2. At the conclusion of the Hearing, the Court approved the Disclosures on a final basis and confirmed the Combined Plan subject to certain agreed nonmaterial changes and submission of an agreed order (the “Confirmation Order”). The Court directed the Debtors to provide a copy of the proposed Confirmation Order to parties who had (i) objected to confirmation of the Plan or (ii) provided comments to the Confirmation Order.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The Debtors' mailing address is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

3. The Debtors and the parties identified in paragraph 2 above have agreed to the terms of the Confirmation Order attached hereto as **Exhibit A**.

4. A blacklined copy of the Confirmation Order (without exhibits as a copy of the blacklined Plan is available at Docket No. 669) is attached hereto as **Exhibit B**, showing changes from the proposed order filed with the Court on October 30, 2022 [Docket No. 638].

5. Accordingly, the Debtors respectfully request entry of the Confirmation Order attached hereto as **Exhibit A** at the Court's earliest convenience.

Dated: November 2, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Mary F. Caloway

Laura Davis Jones (DE Bar No. 2436)
Timothy P. Cairns (DE Bar No. 4228)
Mary F. Caloway (DE Bar No. 3059)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19899 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
tcairns@pszjlaw.com
mcaloway@pszjlaw.com

-and -

DENTONS US LLP

Samuel R. Maizel (*pro hac vice* pending)
Tania M. Moyron (*pro hac vice* pending)
601 S. Figueroa Street #2500
Los Angeles, CA 90017
Telephone: (213) 623-9300
Email: samuel.maizel@dentons.com
tania.moyron@dentons.com

-and-

DENTONS US LLP

David F. Cook
1900 K Street, NW
Washington, DC 20006
Telephone: (202) 496-7500
Email: david.f.cook@dentons.com

Counsel for Debtors and Debtors in Possession